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INTERVENTION

ORIGINAL

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ARIZONA CORPORATION COMMISSION

Arizona Corporation Commission

WILLIAM A. MUNDELL

DOCKETED

MAR -4 P 3:09

Chairman

JIM IRVIN

MAR 04 2002

Commissioner

MARC SPITZER

Commissioner

DOCKETED BY

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E-00000A-02-0051

E-01345A-01-0822

~~E-00000A-01-0630~~

E-01933A-02-0069

E-01933A-98-0471

IN THE MATTER OF THE GENERIC
PROCEEDINGS CONCERNING
ELECTRIC RESTRUCTURING.

ISSUES IN THE MATER OF TUCSON
ELECTRIC POWER COMPANY'S
APPLICATION FOR A VARIANCE OF
CERTAIN ELECTRIC COMPETITION
RULES COMPLIANCE DATES.

DOCKET NO. E-01933A-02-0069

IN THE MATTER OF THE GENERIC
PROCEEDING CONCERNING THE
ARIZONA INDEPENDENT
SCHEDULING ADMINISTRATOR.

DOCKET NO. E-00000-01-0630

Pursuant to A.A.C. R14-3-105, Southwestern Power Group, II. L.L.C., Bowie Power Station,

L.L.C. and Toltec Power Station, L.L.C. (collectively, "Applicants") hereby make application for
leave to intervene in the above-captioned proceeding. ¹ This Application is supported by the
following facts and information:

1. As a result of the Commission's February 8, 2002 Order consolidating Docket No.
E-0345A-01-0822 with Docket Nos. E-00000A-02-0051, E-00000A-01-0630, E-01933A-02-0069
and E- 01933A-98-0417, Applicants may be directly and substantially affected by one or more

¹ As noted below, the instant consolidated docket also includes Commission Docket Nos.
E-01345A-01-0822 and E-01933A-01-98-0471. Applicants have previously been granted
intervenor status in the former proceeding. As to the latter, that docket has nothing to do with
the Electric Competition Rules, and thus the Applicants do not seek intervention therein.

1 decisions of the Commission in the above-consolidated proceedings.

2 2. Applicants' interest in the latter three proceedings mentioned above are not
3 adequately and sufficiently represented by any party currently involved in these matters.
4

5 3. The granting of intervenor status to Applicants will not result in delay in the
6 proceedings or cause the issues to be resolved therein to be unduly broadened.

7 4. Copies of all notices, exhibits, pleadings and orders in these proceedings should be
8 sent to:
9

10 Lawrence V. Robertson, Jr
11 MUNGER CHADWICK, P.L.C
12 National Bank Plaza
13 333 North Wilmot, Suite 300
14 Tucson, Arizona 85711
15 Fax: (520) 747-1550
16 E-Mail: lvrobertson@mungerchadwick.com

Tom Wray, General Manager
Southwestern Power Group, II

Phoenix, Arizona
Fax: (602) 808-2099
E-Mail: twray@southwesternpower.com

15 5. Applicants are willing to accept electronic service of all documents

16 WHEREFORE, in view of the foregoing, Applicants respectfully request that the
17 Commission grant Applicants' Application for leave to intervene in the above-captioned
18 proceedings, and that Applicants be accorded the full status of intervenors under the Commission's
19 Rules of Practice and Procedure.
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21 Respectfully Submitted,

22 
23

24 By: Lawrence V. Robertson, Jr.
25 MUNGER HADWICK P.L.C.
26 Attorneys for Southwestern Power Group, II L.L.C
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28

MUNGER CHADWICK, P.L.C.
ATTORNEYS AT LAW
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The original and ten (10) copies
filed this 4th day of March, 2002 with:
Docket Control
Arizona Corporation Commission
1200 W. Washington
Phoenix, AZ 85007

COPY of the foregoing mailed,
e-mailed, faxed or hand-delivered
this 4th day of March, 2002 to:

All parties of record
